

REMARKS

Claims 1-10 and 14-44 are pending in the present application. The Examiner objected to the claims, objected to claims 7 and 11 due to a potential double patenting, and has rejected claims 1-10 and 14-44 under 35 U.S.C. §103. Applicant has amended claims 1, 14, 15, 17, 20, 23, 33-35, 39, and 41, canceled claim 22, and added new claims 45 and 46. No new matter has been added.

Claim Objections:

The Examiner objected to claims 1, 12-13, 24, and 32 due to informalities. Applicant has corrected the informalities in claims 1 as requested by the Examiner. Applicant has canceled claims 12-13 in the response filed on June 14, 2007. Regarding claim 24, Applicant corrected the word "references" to read "reference" in the response filed on June 14, 2007. Regarding claim 32, Applicant inserted the phrase "so as to" into the last line of the claim in the response filed on June 14, 2007. Reconsideration and withdrawal of this objection are respectfully requested.

Double Patenting Objection:

The Examiner also objected to claims 7 and 11 because of potential double patenting. Applicant has canceled claim 11 in the response filed on June 14, 2007. Reconsideration and withdrawal of this objection are respectfully requested.

Section 103 Rejections:

Claims 1-13 were rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent Application Publication No. 2002/0082953 (Batham, et al.) in view of U.S. Patent Application Publication No. 2003/0115147 (Feldman, et al.).

Claims 2-5 were rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice.

Claims 6, 8-10, and 12-13 were rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, official notice, and further in view of U.S. Patent No. 5,392,066 (Fisher, *et al.*).

Claims 7 and 11 were rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, Fisher, and official notice, and further in view of U.S. Patent Application Publication No. 2002/0102966 (Lev, *et al.*).

Claims 14 and 17-35 were rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice.

Claims 15-16, 36-37 and 43 were rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice, and further in view of Fisher and Lev.

Claim 38 was rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice.

Claim 39 was rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice.

Claims 40 and 44 were rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice, and further in view of Fisher and Lev.

Claim 41 was ejected under 35 U.S.C. §103(a) as being obvious over Batham in view of Feldman.

Claim 42 was ejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice.

Batham is directed to a system for producing a catalog from a previously existing database. The objects that form the subject matter of Batham are GUI objects, not XML documents. The Examiner has cited Feldman as teaching the use of XML files based on a Document Type Definition. Feldman is directed to an electronic content management

system and discloses the use of XML to implement digital rights access for digital rights management (DRM). The Examiner has further contended that XML files are well known, that there is motivation to combine Batham and Feldman, and that the use of XML is not a patentable innovation.

Applicant respectfully disagrees with the Examiner, and urges that the Examiner has significantly misunderstood the invention recited in claims 1, 14, 38, 39, and 41.

In general, an electronic document includes three aspects: structure, content and style. Style applies to the particular type of media, such as online presentation, hardcopy printing, CD presentation, etc. There are different style requirements for each media.

XML is a meta language for describing electronic document structure and content for data exchange. It can separate document content/structure from presentation styles in an electronic document. In order to present an XML document for a printer, screen or CD, one needs to associate the proper style information to render those media usable. A style should be specifically designed based on a document structure for presenting the document content on a specific type of media.

Applicant's claimed methods of generating catalog documents can be distinguished from the Examiner's references.

Batham does not teach or suggest the use of templates to specify the structure of a catalog document. Applicant's catalog document structures are not fixed and are not limited to being displayed on a computer screen with a fixed screen layout. Applicant's catalog documents are based on templates and there are different templates for different product catalog document structures. Templates are recited in amended claims 14 and 39 and new dependent claim 46, and are described in step 2.1 of Applicant's FIG. 6 and detailed in FIG. 7. In the catalogs disclosed in Batham, only the catalog content is created from the database, where the content is to be displayed on a computer screen with a fixed screen layout structure defined in the application program.

After the catalog generation steps, Applicant's catalog documents are XML documents with a catalog structure and content but without style information. These XML documents include user-defined (i.e. templates) structures in addition to content, which can be associated with different catalog styles for printing, online, etc. This catalog structure is distinguishable from the DRM structure referred to in Feldman.

The combination of Batham and Lev also do not teach or suggest the use of styles in publishing catalogs into catalog documents, recited in independent claims 1, 38 and 41 and dependent claims 36-37 and described in step 2.2 of Applicant's FIG. 6 and detailed in FIG. 10. The Examiner cited Lev against claims 36-37 as teaching extracting data, including labels and symbols, from images. However, Lev is directed to an object identification method for portable wireless devices, and neither discloses or suggests *publishing said catalog as at least one of a delivery database and a set of file directories, . . . publishing an organization of a product structure for said catalog; publishing an organization of a product structure for said respective selected views; and publishing an organization of a product structure of definitions, styles, and product documents for said respective selected views*, as essentially recited in claims 36-37. Lev also neither discloses nor suggests that these objects are XML document objects. As with Batham, only the content is created, where the content is to be displayed on a computer screen with a fixed screen layout structure defined in the application program. Applicant's styles files are designed, published, and associated with XML catalogs for hardcopy printing, online presentation, or CD presentation. In other words, a catalog publishing process as recited in Applicant's claims 1, 38, and 41 can associate a single sourced catalog based on XML with different styles for catalog documents on difference media.

It is only after catalog publishing step that the catalog is in a document form having styles. In general, the style information determines the presentation of the XML documents for rendering using a particular media. A style includes page model, font size, layout, etc., for a particular catalog content and structure generated from the catalog generation step.

For DRM documents based on XML with specific DRM Document Type Definitions (DTD), such as those disclosed in Feldman, the DRM DTD cannot be used for product catalog DTD. There is no style for DRM documents, whose purpose is for data exchange. Thus, DRM documents cannot be used for presentation or printing purposes.

The Examiner compares Applicant's catalog documents with those of Batham only from a catalog content creation viewpoint. However, for Batham, the word "catalog" refers to catalog content as displayed in a computer screen layout. For the reasons presented above Applicant's methods for creating document structures and styles are neither disclosed nor suggested by Batham's catalog documents, which are content-only catalogs, nor by Feldman's documents, which are DRM structure-specific XML documents.

Thus, Applicant urges that since the combination of Batham and Feldman fail to teach or suggest all limitations recited by independent claims 1, 14, 38, 39 and 41, these claims are not *prima facie* obvious over Batham and Feldman. Similarly, Applicant urges that claims 36-37 are not *prima facie* obvious over Batham, Feldman and Lev. Reconsideration and withdrawal of these rejections are respectfully requested.

Claims 2-5, 17-35, 40 and 42 all depend from claims 1, 14, 39, and 41, respectively, and are thus patentable for at least the same reasons as claims 1, 14, 39, and 41. Reconsideration and withdrawal of these rejections are respectfully requested.

Furthermore, the Examiner took official notice regarding claims 2, 14, 17, 21-23, 34, 37-39, and 42. However, for the reasons discussed above, Applicant urges that these claims are not obvious over Batham and Feldman. Reconsideration and withdrawal of these rejections are respectfully requested.

Regarding claims 6 and 8-10, the Examiner cited Fisher for teaching selectively generating and adding overlays, and combining image data and overlays. However, Fisher fails to rectify the deficiencies of Batham and Feldman, discussed above. Therefore, Applicant urges that a *prima facie* case of obviousness of claims 6 and 8-10

over Batham, Feldman, and Fisher cannot be maintained. Reconsideration and withdrawal of these rejections are respectfully requested.

Regarding claims 7, 15-16, 40 and 43-44, the Examiner cited Lev as teaching extracting data, including labels and symbols, from images. However, Lev fails to rectify the deficiencies of Batham, Feldman and Fisher, discussed above. Therefore, Applicant urges that a *prima facie* case of obviousness of these claims over Batham, Feldman, Fisher, and Lev cannot be maintained. Reconsideration and withdrawal of these rejections are respectfully requested.

CONCLUSION

Applicant urges that amended claims 1-10, 14-21, and 23-46 are in condition for allowance for at least the reasons stated. Early and favorable action on this case is respectfully requested.

Respectfully submitted,

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